

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

JENNIFER PIGGOTT and
SLADE PIGGOTT,

Plaintiffs,

v.

GRAY CONSTRUCTION, INC.,

Defendant.

Case No.: CV-06-1158

REPORT OF PARTIES PLANNING MEETING

1. Pursuant to Federal Rules of Civil Procedure, Rule 26(f), a telephonic meeting was held on March 6, 2007 and was attended by Julia Ann Beasley, attorney for Plaintiffs Jennifer Piggott and Slade Piggott ("Plaintiffs"), James A. Rives, attorney for Plaintiff in Intervention Hwashin America Corporation ("Hwashin"), and Brian M. McClendon, attorney for Defendant Gray Construction, Inc. ("Gray").

2. **Pre-Discovery Disclosures.** The Parties will exchange the information required by Fed.R.Civ.P. 26(a)(1) by March 23, 2007.

3. **Discovery Plan.** The Parties jointly propose to the Court the following discovery plan:

(a) Discovery will be needed on the following subjects: Gray disputes both liability and damages. Discovery will be necessary in regard to all of Plaintiffs' claims and Hwashin's claims in intervention. Mr. and Mrs. Piggott will need to conduct discovery regarding their claims and Gray's defenses. Hwashin will need to conduct discovery regarding its claims for subrogation and Gray's defenses.

(b) All discovery will be commenced in time to be completed by February 1, 2008.

(c) Maximum of 40 Interrogatories by each Party to any other Party. (Responses due 30 days after service.)

(d) Maximum of 40 Requests for Admission by each party to any other party. (Responses due 30 days after service.).

(e) Maximum of 50 Requests for Production of documents by each party to any other party. (Responses due 30 days after service.).

(f) Maximum of 10 depositions by Plaintiff, 10 depositions by Hwashin and 10 depositions by Defendant.

(g) Each deposition shall be limited to seven hours, excluding breaks.

(h) Reports from retained experts under Rule 26(a)(2) due: from Plaintiff by September 28, 2007; from Defendant by November 16, 2007.

(i) Rebuttal reports from previously designated experts under Rule 26(a)(2) due: from Plaintiff by December 14, 2007; from Defendant by January 11, 2007.

(j) Supplementations under Rule 26(e) due within twenty (20) days of obtaining additional discoverable information.

4. Other Items.

(a) The Parties do not request a conference with the Court before entry of the Scheduling Order.

(b) The Parties request a pretrial conference at the end of March, 2008.

(c) Plaintiffs should be allowed until July 13, 2007 to join additional parties and amend the pleadings.

(d) Defendants should be allowed until August 10, 2007 to join additional parties and amend the pleadings.

(e) All potentially dispositive motions must be filed by March 1, 2008.

(f) The Parties cannot accurately evaluate the claims for settlement at this time or whether ADR would be helpful.

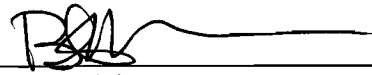
(g) Final lists of witnesses and exhibits under Rule 26(a)(3) should be due from both parties thirty (30) days before trial.

(h) Parties should have fourteen (14) days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

(i) The case should be ready for trial by May, 2008 and at this time is expected to take approximately five (5) days.

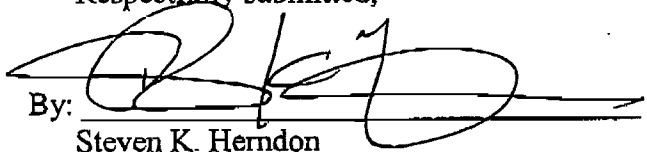
DATED: ~~February~~ ^{MARCH} 13, 2007.

Respectfully submitted,

By: 
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Brian M. McClendon
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Respectfully submitted,

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Attorneys for Plaintiffs
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DATED: February ____, 2007.

Respectfully submitted,

By: _____
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Mickey B. Wright
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Attorneys for Defendant Gray Construction,
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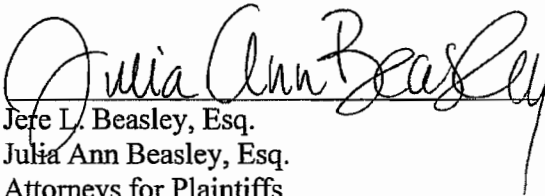
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